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VIA ECF

The Honorable Lorna G. Schofield
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

October 14, 2021

Re: *Manbro Energy Corp. v. Chatterjee Advisors, LLC, et al.*, No. 20-cv-3773 (LGS):
Request to File Under Seal

Dear Judge Schofield:

We respectfully write on behalf of Plaintiff Manbro Energy Corporation (“Plaintiff”), in accordance with Paragraph I.D.3 of Your Honor’s Individual Rules, to request leave to file under seal Plaintiff’s Letter Motion for Conference Regarding Plaintiff’s Anticipated Motion for Summary Judgment (the “Letter”). Parties and attorneys of record who should have access to the sealed document are listed in Appendix A.

Plaintiff makes this sealing request pursuant to Paragraph 11 of the Stipulation and Order of Confidentiality, dated October 21, 2020 (ECF No. 51) (the “Confidentiality Order”). Plaintiff’s Letter references Confidential Information or Discovery Material, as defined in the Confidentiality Order, including excerpts of deposition testimony and materials produced by Defendants in this case.

Pursuant to Paragraph I.D.3 of Your Honor’s Individual Rules, Plaintiff notes that it has no interest in confidential treatment of the information contained in the Letter and, therefore, absent objection by Defendants would propose to file the Letter on the public docket without any redactions. Should Defendants object to public filing and/or propose redactions, Plaintiff will of course be guided by the Court.

Respectfully Submitted,

/s/ Mark E. McDonald

Mark E. McDonald

cc: All Counsel of Record (via ECF)

Appendix A – Parties and Attorneys of Record

Parties

Manbro Energy Corporation

Chatterjee Advisors, LLC

Chatterjee Fund Management, LP

Chatterjee Management Company, d/b/a The Chatterjee Group

Purnendu Chatterjee

Cleary Gottlieb Stein & Hamilton, LLP

Joon H. Kim

Victor L. Hou

Rahul Mukhi

Mark E. McDonald

Gibson, Dunn & Crutcher LLP

Randy M. Mastro

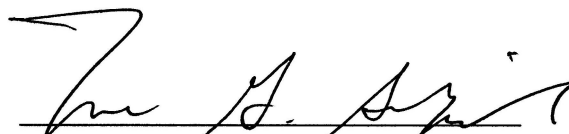
Mark A. Kirsch

Avi Weitzman

Casey Kyung-Se Lee

By **October 22, 2021**, (1) Defendants shall file a response to Plaintiff's letter at Dkt. No. 138 and a separate response to Plaintiff's letter at Dkt. No. 139, and (2) Plaintiff shall file a response to Defendants' letters at Dkt. Nos. 141 and 143 and two separate responses to Defendants' letters at Dkt. Nos. 142 and 144. So Ordered.

Dated: October 15, 2021
New York, New York


LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE